

STATE OF MAINE
ANDROSCOGGIN, SS.

SUPERIOR COURT
CIVIL ACTION
DOCKET NO.: *CV 10-33*

VERONICA D. DUGUAY,

Plaintiff,

v.

FRANK E. WILSON,

and

SWIFT TRANSPORTATION CO.,
INC.,

Defendants,

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COMPLAINT

NOW COMES Plaintiff Veronica D. Duguay by and through counsel, and complains against Defendants as follows:

1. Plaintiff Veronica D. Duguay is, and at all relevant times has been, a resident of the Town of Livermore Falls, County of Androscoggin, and State of Maine.

2. Defendant Frank E. Wilson, on information and belief, is a resident of Atlantic City, State of New Jersey.

3. Defendant Swift Transport Co. Inc. (Swift) is a corporation organized under the laws of the State of Arizona, with a principal place of business in the City of Phoenix, State of Arizona.

4. Defendant Swift was doing business in the State of Maine at the time of the accident that is the subject of this complaint.

5. On or about February 22, 2004, Plaintiff was operating an ambulance on Route 108 in Peru, Maine.

6. On that same date, Defendant Wilson was operating a vehicle owned by defendant Swift in the opposite direction on Route 108.

7. Mr. Wilson negligently operated the truck owned by Swift, which negligence includes, but is not limited to, failing to see what was there to be seen and failing to have control of his vehicle.

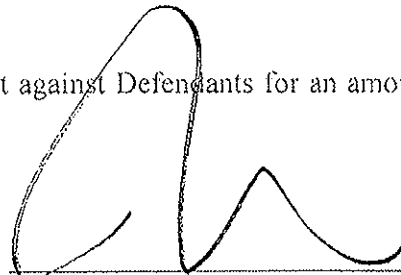
8. Mr. Wilson was acting within the scope of his employment or as an agent for Swift at the time of the accident.

9. Mr. Wilson's negligence proximately caused the truck to collide with the ambulance being operated by the Plaintiff.

10. The collision proximately caused plaintiff to suffer injury and damages which include, but are not limited to, physical and mental pain and suffering, past, present, and future medical expenses, loss of earning and earning capacity, permanent incapacity, and loss of enjoyment of life.

WHEREFORE, Plaintiff demands judgment against Defendants for an amount to be set by the fact finder and for her interest and costs.

Dated: February 8, 2010

A handwritten signature in black ink, appearing to read 'William D. Robitzek', is written over a horizontal line.

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